

Exhibit D

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

<p>In re:</p> <p>FAIRFIELD SENTRY LIMITED, et al.,</p> <p>Debtor in Foreign Proceedings.</p>	<p>Chapter 15 Case</p> <p>Case No. 10-13164 (CGM)</p> <p>Jointly Administered</p>
<p>FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>THEODOOR GGC AMSTERDAM, et al.,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-03496 (CGM)</p> <p>Administratively Consolidated</p>
<p>FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ABN AMRO SCHWEIZ AG, et al.,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-03635 (CGM)</p>
<p>FAIRFIELD SENTRY LTD. (IN LIQUIDATION), et al.,</p> <p>Plaintiffs,</p> <p>v.</p> <p>ABN AMRO SCHWEIZ AG, et al.,</p> <p>Defendants.</p>	<p>Adv. Pro. No. 10-03636 (CGM)</p>

DEFENDANT BANQUE INTERNATIONALE À LUXEMBOURG SA'S
AMENDED INITIAL DISCLOSURES

Defendant Banque Internationale à Luxembourg SA (“BIL”), formerly known as Dexia Banque Internationale à Luxembourg SA, hereby makes the following amended initial disclosures pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, made applicable by Rule 7026 of the Federal Rules of Bankruptcy Procedure.

By motion dated October 29, 2021, BIL has moved to dismiss these actions for lack of personal jurisdiction and the Court has allowed limited jurisdictional discovery pursuant to the Federal Rules of Civil Procedure. Accordingly, these amended initial disclosures are limited to matters relevant to the issue of personal jurisdiction over BIL in these cases.

These disclosures are based on a reasonable investigation of matters relevant to the issue of personal jurisdiction. BIL reserves the right to amend or supplement these amended initial disclosures as necessary in the event the Court finds that BIL is subject to personal jurisdiction or in the event additional or different information becomes available to BIL.

BIL responds to the categories of initial disclosure set forth in Rule 26(a)(1) as follows:

(i) the name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment;

<u>Name</u>	<u>Address and Telephone Number</u>	<u>Subject(s)</u>
Gianni Baldanucci	Former employee; last known address and telephone number withheld based on General Data Protection Regulation; may be contacted through Clifford Chance.	Subscription and redemption through Citco Global Custody (NA) NV, Netherlands

<u>Name</u>	<u>Address and Telephone Number</u>	<u>Subject(s)</u>
Chantal May-Reyter	Former employee; last known address and telephone number withheld based on General Data Protection Regulation; may be contacted through Clifford Chance.	Redemption through Citco Global Custody (NA) NV, Netherlands
Marie-Claire Meyers	Former employee; last known address and telephone number withheld based on General Data Protection Regulation; may be contacted through Clifford Chance.	Subscription and redemption through Citco Global Custody (NA) NV, Netherlands
Jeannot (Benny) Reiter	Former employee; last known address and telephone number withheld based on General Data Protection Regulation; may be contacted through Clifford Chance.	Subscription and redemption through Citco Global Custody (NA) NV, Netherlands
Marie-Ann Salentiny	Current employee; may be contacted through Clifford Chance.	Redemption through Citco Global Custody (NA) NV, Netherlands
Mario Totaro	Current employee; may be contacted through Clifford Chance.	Subscription and redemption through Citco Global Custody (NA) NV, Netherlands

(ii) a copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment;

<u>Category</u>	<u>Location</u>
Account opening documents and other client documents for the relevant client	BIL 69, Route D'Esch L-2953, Luxembourg
Transaction files for the relevant subscription and redemption	BIL 69, Route D'Esch L-2953, Luxembourg
Account statements for the relevant client account	BIL 69, Route D'Esch L-2953, Luxembourg

(iii) a computation of each category of damages claimed by the disclosing party—who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered; and

BIL does not claim any damages in this action.

(iv) for inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

BIL is not aware of any responsive insurance agreement.

Dated: New York, New York
October 11, 2022

CLIFFORD CHANCE US LLP

By: 

Jeff E. Butler

31 West 52nd Street
New York, NY 10019
Telephone: (212) 878-8000
jeff.butler@cliffordchance.com

*Attorneys for Defendant Banque
Internationale à Luxembourg SA
f/k/a Dexia Banque Internationale à
Luxembourg SA*